

MELANIE D. MORGAN, ESQ.
Nevada Bar No. 8215
SCOTT R. LACHMAN, ESQ.
Nevada Bar No. 12016
AKERMAN LLP
1635 Village Center Circle, Suite 200
Las Vegas, NV 89134
Telephone: (702) 634-5000
Facsimile: (702) 380-8572
Email: melanie.morgan@akerman.com
Email: scott.lachman@akerman.com

Attorneys for Bank of America, N.A.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NORMAN, LLC, a Nevada limited liability
company,

Plaintiff,

v.

NATIONAL DEFAULT SERVICING
CORPORATION, an Arizona corporation;
BANK OF AMERICA, N.A., a national banking
association; NEVADA LEGAL NEWS, LLC, a
Nevada limited liability company; DOES I
through X and ROE BUSINESS ENTITIES I
through X, inclusive,

Defendants.

Case No.: 2:22-cv-00837-RFB-EJY

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

Norman, LLC and Bank of America, N.A. (**BANA**) stipulate that BANA shall have 14 days after the court's adjudication of Norman's motion to remand to file its response to Norman's complaint. ECF Nos. 6 & 7. The court's adjudication of Norman's motion to remand will impact what court BANA files its response—if the motion is granted, BANA will file its response in state court, and if the motion is denied, BANA will file its response in federal court. This stipulation does not preclude BANA from filing its response while Norman's motion is pending, however it sets a firm deadline for BANA to respond should the court deny Norman's motion to remand.

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The failure of BANA to previously file its response to Norman's complaint is a result of excusable neglect since (1) BANA is focusing its attention on its response to Norman's motion to remand; (2) BANA and Norman are seriously exploring settlement options in this matter as well as other related quiet title matters in both in this court and in the state district court; and (3) counsel for Norman and BANA were preparing for trial and then attended trial in state court in a quiet title matter.

This is the parties' first request for an extension of this deadline and is not intended to cause any delay or prejudice to any party.

DATED this 13th day of June, 2022.

AKERMAN LLP <u>/s/ Scott R. Lachman</u> MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134 <i>Attorneys for Bank of America, N.A.</i>	HONG & HONG LAW OFFICE <u>/s/ Joseph Y. Hong</u> JOSEPH Y. HONG, ESQ. Nevada Bar No. 5995 1980 Festival Plaza Drive, Suite 650 Las Vegas, NV 89135 <i>Attorneys for Norman, LLC</i>
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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE
 Case No. 2:22-cv-00837-RFB-EJY

DATED: June 13, 2022